

# LAW OFFICE OF GARY GREENBERG, ESQ.

*99 Hudson Street, 5<sup>th</sup> Floor  
New York, New York 10013*

Phone: 212-765-5770  
E-mail: gg@greenberglaw.com

October 17, 2022

BY ECF

The Honorable Victor Marrero  
United States District Court  
for the Southern District of New York  
500 Pearl Street, Room 1040  
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup, Inc., et al.,  
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Marrero:

I am co-counsel to the Plaintiff, and file this letter motion to seal ECF Document #137, a redacted letter to the Court dated October 5, 2022 (filed pursuant to this Court's Order dated October 6, 2022, ECF#136).

This afternoon, co-counsel David Lurie received a call from a media representative who claimed that, using a program, he was able to “unredact” the redacted portions of the October 5, 2022 letter. I immediately called the SDNY Help Desk, and they have temporarily sealed ECF#137 pending this application to the Court. I should note that the Help Desk advised me that they had examined ECF#137 and it appeared to be redacted. Nevertheless, out of an excess of caution, I am filing this letter motion to request that ECF#137 be ordered sealed, so that I can replace it with a substitute redacted copy of the October 5, 2022 letter that would be impervious to “unredacting.”

Thank you for your consideration.

Respectfully Submitted,



Gary Greenberg